Case: 4:24-cv-01316-MTS   Doc. #: 1-6   Filed: 09/03/24   Page: 1 of 10 PageID #:
130
Case 2:24-cv-00103-LGW-BWC   Document 1-6   Filed 09/03/24   Page 1 of 1

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

STATE OF MISSOURI,	*	
STATE OF GEORGIA,	*	
STATE OF ALABAMA,	*	
STATE OF ARKANSAS,	*	
STATE OF FLORIDA,	*	
STATE OF NORTH DAKOTA, and	*	
STATE OF OHIO,	*	
	*	
Plaintiffs	*	Civil Action No: _____
	*	
v.	*	
	*	
UNITED STATES DEPARTMENT	*	
OF EDUCATION,	*	
	*	
MIGUEL A. CARDONA, in his official	*	
capacity as Secretary, United States	*	
Department of Education, and	*	
	*	
JOSEPH R. BIDEN, Jr., in his official	*	
capacity as President of the United States,	*	
	*	
Defendants	*	

EXHIBIT "F"

TO COMPLAINT

From:	USDSCORTEAM <USDSCORTEAM@ed.gov>
Sent:	Tuesday, June 18, 2024 11:17 AM
To:	Farmer, Jennifer; grp.MOHELAUSDSTeam
Cc:	FSAVendorManagementTeam; Singleton, Rhonda; Lew, Kimberly; Miller, Debbie; Jenkins, Lateata; Booker, Anthony; Jackson, Maxine; Carroll, Marie; Meads, Dawn; Brown, Nicole; Zavala, Nina; Parker, Kristen; Brown, Taris; Frisby, Emir; Deadwyler, Anita; POC Change Request; Merchant, Denise; Lisa Tessitore; Oversight Special Projects; Boyd, Caryn; Fenwick, Benjamin; Mcclam, Jackson; Hardiman, Darrick; Lene, Christina; Dick, Jeremy; Hankish, James; Oversight Special Projects; USDSCORTEAM; USDSISSOs; FSAVendorManagementTeam; FSAVendorOversightGroup; Brillant, Nannie; BCM_Communications; FSA ACQ Loan Servicing Team
Subject:	To USDS-MOHELA - 7037 - Updated Attachment for CR 7037 Student Debt Relief
Attachments:	CR 7037 Requirements V6.docx

Caution: This email originated from outside the organization. Please take care when clicking links or opening attachments.

USDS-MOHELA,

There has been a minor change to the discharge codes servicers will use when reporting back to NSLDS. We have highlighted the changes on the attached document, and we listed them below for reference as well:
- M1~~D1~~ for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - $20,000
- M2~~D2~~ for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - Unlimited
- M4~~D3~~ as the forgiveness Measure 2: Forgiveness after 20 Years
- M5~~D4~~ as the forgiveness Measure 2: Forgiveness after 25 Years
- M3~~D5~~ as the forgiveness Measure 3: Eligible for SAVE Forgiveness, Not Applied

To keep our processes streamlined and ensure notifications are received, please reply-all to acknowledge receipt of this information.

Thank you,

FSA USDS COR Team
USDSCORTEAM@ed.gov

EXHIBIT

F

1

Implementation Date: 9/1/2024

CR 7037 – Servicer Student Debt Relief (SDR) – DRAFT

FSA is in the process of implementing additional types of loan forgiveness for borrowers. Multiple additional types of forgiveness are being implemented with the requirements listed below – those types are Measure 1 (Current Balance Exceeds Original Principal Balance Forgiveness), Measure 2 (Forgiveness after 20 or 25 Years), and Measure 3 (Eligible Not Applied). Going forward they will be referred to by Measure 1, Measure 2, or Measure 3. The application of each Measure is exclusive to a single loan for example, a single loan cannot receive Measure 3 and 1 forgiveness. Measure 1 will be provided in a new file as described within the requirements. Measures 2 and 3 may be included in the same direct to discharge file.

The servicer shall provide a breakout level of effort (ROM) and cost for each requirement listed below.

43000 [ADDED] Student Debt Relief Forgiveness

- **43000.000: The servicer shall support the implementation of Measure 1 – Current Balance Exceeds Original Principal Balance Forgiveness.**
  - 43000.010: The servicers shall submit to NSLDS the 9/1/2024 principal and interest balance of every loan on their system.
    - 43000.011: Servicers shall submit the balances only for loans with total balance of >$0.00.
    - 43000.012: Servicers shall include the submission within a unique NSLDS reporting batch.
    - 43000.013: Servicers shall report the balance of the loans using the NSLDS AQ record with a date of outstanding balance = 20240901
    - 43000.014: Servicers shall report the balances/send the batch file no earlier than 9/2/2024 but no later than 9/5/2024.
    - 43000.015: Servicer shall resolve all errors or discrepancies identified by NSLDS or FSA by 9/6/2024. No cost can be associated with this requirement. Servicers are required to report timely and accurately.
    - 43000.016: All Servicers (including DMCS) shall include FFEL Fresh Start and FFEL Special Mandatory Assignment loans (SMAG and FSPG) with total balances of >$0.00 in loan batch files to NSLDS.
  - 43000.020: The servicer shall accept a new Measure 1 forgiveness request file from NSLDS that contains at a minimum the data elements defined below:
    - 43000.021: For all loans:
      1. Borrower SSN
      2. Borrower Last Name
      3. Borrower First Name
      4. Borrower Date of Birth
      5. Award ID
      6. Maximum Eligibility Amount
      7. Amount of Forgiveness calculated by NSLDS to be applied to the loan
    - 43000.022: For non-Consolidation loans:
      1. Loan Type
      2. Loan Date
      3. OPEID
      4. Loan Amount
      5. Statutory Interest Rate
      6. Actual Interest Rate
      7. Loan Status on Sept 1, 2024
      8. Loan Status Date on Sept 1, 2024
      9. OPB on Sept 1, 2024
      10. OPB Date
      11. OIB on Sept 1, 2024
      12. OIB Date
      13. Most Recent Disbursement Date
         a. Only populated if loan first disbursed before January 1, 2005 or if the Total Disbursed is used to drive the amount of eligibility.

FC042524

14. Total Disbursement Amount
   a. Only populated if loan first disbursed before January 1, 2005 or if the Total Disbursed is used to drive the amount of eligibility.
15. Date Entered Repayment
   a. Only populated if loan first disbursed on or after January 1, 2005
16. OPB at the time that the loan entered repayment
   a. Only populated if loan first disbursed on or after January 1, 2005
17. Date of OPB at the time that the loan entered repayment
   a. Only populated if loan first disbursed on or after January 1, 2005
18. Accrued Interest at the time the loan entered repayment
   a. Only populated if loan first disbursed on or after January 1, 2005
19. Date of Accrued Interest at the time that the loan entered repayment
   a. Only populated if loan first disbursed on or after January 1, 2005

- 43000.023: For Consolidation loans:
  1. Consolidation Loan Type
  2. Consolidation Loan Date
  3. Consolidation Loan Amount
  4. Consolidation OPEID
  5. Consolidation Statutory Interest Rate
  6. Consolidation Actual Interest Rate
  7. Consolidation Loan Status on Sept 1, 2024
  8. Consolidation Loan Status Date on Sept 1, 2024
  9. Consolidation OPB on Sept 1, 2024
  10. OPB Date
  11. Consolidation OIB on Sept 1, 2024
  12. OIB Date
  13. Sum of Underlying Loan Principal Balance at the time of repayment or Total Disbursed or Loan Amount, as applicable
  14. Sum of Underlying Loan Accrued Interest at the time of repayment or Total Disbursed or Loan Amount, if applicable

o 43000.030: The servicer shall accept the new Measure 1 file via SAIG.
   - 43000.031: FSA will provide the updated message class prior to IST.
o 43000.040: Servicers should anticipate receiving three (3) or more Measure 1 forgiveness files.
o 43000.050: The servicer shall apply loan forgiveness to loans included in the Measure 1 file.
   - 43000.051: The servicer shall not apply forgiveness until the end of the opt-out period described in requirement 43006.000 and directed by FSA.
   - 43000.052: All forgiveness shall be applied with an effective date of 9/1/2024.
   - 43000.053: Servicers shall apply the amount found in the "Amount of Forgiveness calculated by NSLDS to be applied to the loan" element of the Measure 1 forgiveness file to the associated loan.
   - 43000.054: The amount of forgiveness shall be first applied to outstanding interest.
   - 43000.055: If the amount of forgiveness is greater than the amount of outstanding interest, the forgiveness amount remaining after forgiving interest (difference between the Amount of Forgiveness minus the reduction applied to Accrued Interest) shall be applied to principal.
   - 43000.056: All servicing activity (payments, etc.) that occurred on/after 9/1/2024 shall be reapplied after the forgiveness has been applied.
   - 43000.057: Servicers shall complete all Measure 1 forgiveness processing, to include sending borrower notifications, within 10 business days following the opt-out period or servicer receipt of the production file, whichever is later.
   - 43000.058: The servicer shall begin processing the Measure 1 forgiveness file immediately upon receipt and approval from FSA to begin the discharge. FSA will provide 5 calendar day notice prior to file receipt.

o 43000.060: The servicer shall notify each Measure 1 borrower once forgiveness has been applied.
   - 43000.061: The notice to borrowers will be dynamic and include borrower specific elements such as borrower identifiers/loan identifiers, forgiveness amounts and remaining balances.

- 43000.062: Servicers will be provided the FSA-approved Measure 1 forgiveness notice language/format no later than 20 calendar days prior to the servicers' receipt of the forgiveness file.

  o 43000.070: The servicer shall redisclose borrowers not on an IDR plan in a manner that impacts the next billing cycle after the discharge is applied. For borrowers on an IDR plan, the servicer shall adjust the payment with the next recertification.

  o 43000.080: The servicers shall provide Measure 1 forgiveness response information to NSLDS weekly as part of NSLDS reporting.
    - 43000.081: The servicer shall provide the response file via SAIG.
    - 43000.082: The response file will include (at a minimum):
      1. Borrower SSN
      2. Borrower Last Name
      3. Borrower First Name
      4. Borrower Date of Birth
      5. Award ID
      6. Forgiveness Measure Indicator
      7. Forgiveness Effective Date
      8. Total Forgiveness Applied to the Loan Balance
      9. Total Forgiveness Applied to Loan OPB
      10. Total Forgiveness Applied to Loan OIB
      11. Loan Not Processed Indicator
      12. Loan Not Processed Reason
          a. Loan Transferred to another servicer
          b. Loan consolidated at same servicer
          c. Loan consolidated to another servicer
          d. Loan paid in full, discharged, or forgiven
          e. Loan is in TPD monitoring
          f. Loan Not Found
          g. Borrower Opt Out
          h. Borrower Applied for Consolidation Loan
          i. Loan pending discharge or forgiveness
    - 43000.083: The new Forgiveness Measure Indicators will be:
      1. M1D1 for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - $20,000.
      2. M2D2 for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - Unlimited.
      3. M4D3 as the forgiveness Measure 2: Forgiveness after 20 Years.
      4. M5D4 as the forgiveness Measure 2: Forgiveness after 25 Years.
      5. M3D5 as the forgiveness Measure 3: Eligible for SAVE Forgiveness, Not Applied.

Formatted: Highlight

- **43001.000: The servicer shall support the implementation of Measure 2 – Forgiveness after 20 or 25 Years.**
  o 43001.010: The servicer shall receive an updated D2D file that will include additional indicators to distinguish additional forgiveness types to include Measure 2 and Measure 3 forgiveness.
    - 43001.011: The five new forgiveness codes shall be:
      1. M1D1 for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - $20,000.
      2. M2D2 for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - Unlimited.
      3. M4D3 as the forgiveness Measure 2: Forgiveness after 20 Years.
      4. M5D4 as the forgiveness Measure 2: Forgiveness after 25 Years.
      5. M3D5 as the forgiveness Measure 3: Eligible for SAVE Forgiveness, Not Applied.
  o 43001.020: A single D2D file may include multiple forgiveness types in the same file. For example, a file may include M4D3 and M5D4.
  o 43001.030: The servicers shall apply requested forgiveness to loans for Measure 2 forgiveness.

FC042524

- 43001.031: If the servicer receives a consolidation pay-off request for a loan received in the D2D file for Measure 2 before the file is received, the servicer should not apply the forgiveness, but instead report to NSLDS that the loan is in process of being consolidated.
- 43001.032: No forgiveness shall be applied until the opt-out period has ended.
- 43001.033: The forgiveness effective date will be provided in the D2D request file.
- 43001.034: Servicers shall initiate refunds of borrower payments received following the Effective Date of the Loan Forgiveness. Reallocation of payments will not be required for Measure 2.
  Note: If the forgiveness date predates July 1, 2024, then June 30, 2024, will be used as the forgiveness date, so refunds of payments prior to June 30, 2024, will not be required.
- 43001.035: Servicers shall complete all Measure 2 forgiveness processing within 10 business days following the opt-out period.
- 43001.036: Servicers should anticipate receiving three or more (3) Measure 2 forgiveness files.
- 43001.037: Servicers shall complete all Measure 2 forgiveness processing, to include sending borrower notifications, within 10 business days following the opt-out period or servicer receipt of the production file, whichever is later.
- 43001.038: The servicer shall begin processing the Measure 2 forgiveness file immediately upon receipt and approval from FSA to begin the discharge. FSA will provide 5 calendar day notice prior to file receipt.

  o 43001.040: The servicers shall notify each Measure 2 borrower no later than 5 days after forgiveness has been applied.
  - 43001.041: Servicers should anticipate the notice to the borrower will be dynamic and include borrower specific elements such as borrower identifiers/loan identifiers, forgiveness amounts and remaining balances (and possibly others).
  - 43001.042: Servicers will be provided the FSA-approved Measure 2 forgiveness notice language/format no later than 20 calendar days prior to the servicers' receipt of the forgiveness file.
  o 43001.050: The servicer shall provide a response to NSLDS as defined within requirement 43003.000.

- **43002.000: The servicers shall apply requested forgiveness to loans for Measure 3: Borrowers Eligible for Forgiveness on the SAVE plan but Have Not Applied for the SAVE plan (Eligible Not Applied).**
  o 43002.010: The servicer shall receive the modified D2D file described in requirement 43001.010.
  o 43002.020: If the servicer receives a consolidation pay-off request for a loan received in the D2D file for Measure 3 before the file is received, the servicer should not apply the forgiveness, but instead report to NSLDS that the loan is in process of being consolidated.
  o 43002.030: No forgiveness shall be applied until the opt-out period has ended.
  o 43002.040: The forgiveness effective date will be provided in the D2D request file. Note: The earliest effective date shall be December 31, 2023 for this measure, so refunds of payments prior to December 31, 2023, will not be required.
  o 43002.050: Servicers shall initiate refunds of borrower payments received following the effective date of the loan forgiveness. Reallocation of payments will not be required for Measure 3.
  o 43002.060: Servicers shall complete all Measure 3 forgiveness processing, to include sending borrower notifications, within 10 business days following the opt-out period or servicer receipt of the production file, whichever is later.
  - 43002.061: The servicer shall begin processing the Measure 3 forgiveness file immediately upon receipt and approval from FSA to begin the discharge. FSA will provide 5 calendar day notice prior to file receipt.
  o 43002.070: Servicers should anticipate Measure 3 forgiveness will continue as an ongoing process and be included in future D2D files. FSA will provide notification to servicers upon this change.
  o 43002.080: The servicers shall notify each Measure 3 borrower once forgiveness has been applied.

FC042524

- 43002.091: Servicers should anticipate the notice to the borrower will be dynamic and include borrower specific elements such as borrower identifiers/loan identifiers, forgiveness amounts and remaining balances (and possibly others).
      - 43002.092: Servicers will be provided the FSA-approved Measure 3 forgiveness notice language/format no later than 20 calendar days prior to the servicers' receipt of the forgiveness file.
    - 43002.090: The servicer shall provide a response to NSLDS as defined within requirement 43003.000.
- **43003.000: The servicer shall provide Measure 2 and 3 forgiveness response information to NSLDS.**
    - 43003.010: Measure 2 and 3 response information will be sent to NSLDS via SAIG weekly as part of NSLDS reporting. (with a new message class).
    - 43003.020: The elements in the response file are (at minimum):
        1. Borrower SSN
        2. Borrower Last Name
        3. Borrower First Name
        4. Borrower Date of Birth
        5. Award ID
        6. Forgiveness Measure Indicator
        7. Forgiveness File Date
        8. Forgiveness Action:
            a. Forgiveness Applied
            b. Forgiveness Not Applied, Loan Transferred to another servicer
            c. Forgiveness Not Applied, Loan Consolidated at same servicer
            d. Forgiveness Not Applied, Loan Consolidated to another servicer
            e. Forgiveness Not Applied, Loan paid in full, discharged, or forgiven.
            f. Forgiveness Not Applied, Loan is in TPD monitoring.
            g. Forgiveness Not Applied, Loan Not Found
            h. Forgiveness Not Applied, Borrower Opt Out
            i. Forgiveness Not Applied, Borrower Applied for Consolidation Loan
            j. Forgiveness Not Applied, Loan Transferred to DMCS
            k. Forgiveness Not Applied, Loan pending discharge or forgiveness.
    - 43003.030: The five new forgiveness codes (Forgiveness Measure Indicator) shall be:
        1. M1~~D1~~ for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - $20,000.
        2. M2~~D2~~ for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - Unlimited.
        3. M4~~D3~~ as the forgiveness Measure 2: Forgiveness after 20 Years.
        4. M5~~D4~~ as the forgiveness Measure 2: Forgiveness after 25 Years.
        5. M3~~D5~~ as the forgiveness Measure 3: Eligible for SAVE Forgiveness, Not Applied.

- **43004.000: The servicers shall support the addition of additional forgiveness codes within the existing NSLDS interface.**

- **43005.000: The servicers shall support Inter System Testing (IST) for all new and modified interface files with NSLDS.**
    - 43005.010: IST will test all new functionality and exchange of data with NSLDS (at a minimum).

- **43006.000: The servicers shall support an Opt-out process for Measure 1, Measure 2, and Measure 3 forgiveness borrowers.**
    - 43006.010: FSA will provide servicers a copy of the opt-out notification(s) prior to sending the opt-out notice to borrowers.
    - 43006.020: FSA will send the opt-out notification to borrowers and instruct them to contact their servicer if they want to opt-out.
    - 43006.030: The servicer shall note the opt-out on their system and update NSLDS using the Online Update Function (see Requirement 12013.000).
    - 43006.040: Borrowers will only have the option to opt-out on all loans. They cannot opt out of receiving forgiveness on specific loans.
        - 43006.041: Once a borrower opts out, they will not have the option to opt back in.

- o 43006.050: FSA will notify the servicers of the length of the opt out period prior to the opt-out period beginning.
- o 43006.060: The servicers shall provide FSA a daily reporting of all opt-outs per requirement 43009.000 Reporting. FSA will compile this list of opted out borrowers and share it with all of the servicers on no less than a weekly basis (when forgiveness files are being processed).

- **43007.000: The servicers shall include updated forgiveness codes within all existing transfer processes and procedures (sending and receiving of loans to all other federal servicers and DMCS).**
    - o 43007.010: The servicer shall include this information in the Discharge Data Supplemental file. The discharge type values to use in the supplemental file should match the specific Measure Forgiveness Code (M1D1, M2D2, M4D3, M5D4, or M3D5).
    - o 43007.020: The Discharge Data Supplemental file with a previously delayed implementation date shall be implemented with this change request at no additional cost as it is already under contract. See Attachment 18000 Discharge Data v2.
- **43008.000: The servicers shall support twice daily operational reporting and submit the reports NLT 11am ET and 4pm ET each day via Box.com until the initial Measures 1, 2 and 3 discharge files are complete. See SDR Operational Reporting Template for additional details.**

- **43009.000 The servicer shall use the FMS discharge Reason codes in the WRTOFF transactions for each measure as described below.**

    - o M1D1 for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - $20,000. 1133
    - o M2D2 for the forgiveness Measure 1: Current Balance Exceeds Original Principal Balance - Unlimited. 1134
    - o M4D3 as the forgiveness Measure 2: Forgiveness after 20 Years. 1135
    - o M5D4 as the forgiveness Measure 2: Forgiveness after 25 Years. 1136
    - o M3D5 as the forgiveness Measure 3: Eligible for SAVE Forgiveness, Not Applied. 1137

- 43010.000 The servicer shall not process the SDR forgiveness (Measures 1, 2, or 3) on the loan if any of the following discharges/forgiveness are actively pending on the loan:

    - **Borrower Defense to Repayment** – Actively pending = Any borrower in the existing Sweet class or any borrower where an approved BD discharge request has been received at the servicer at the time the SDR request is received.
    - **Forgery** – Actively pending = An approved forgery discharge has been approved at the time the SDR request is received.
    - **Identify Theft** – Actively pending = An approved identity theft discharge has been approved at the time the SDR request is received.
    - **False Certification** – Actively pending = An approved false certification discharge has been approved at the time the SDR request is received.
    - **Automatic Closed School** – Actively pending = An automatic closed school discharge has been approved and provided to the servicer at the time the SDR request is received.
    - **Closed School** – Actively pending = A closed school discharge has been approved at the time the SDR request is received.
    - **Public Service Loan Forgiveness** – Actively pending = A PSLF forgiveness request has been approved and provided to the servicer at the time the SDR request is received.
    - **Income Driven Repayment** – Actively pending = An IDR forgiveness request has been approved and provided to the servicer at the time the SDR request is received.
    - **Total and Permanent Disability**– Actively pending = An IDR forgiveness request has been approved and provided to the servicer at the time the SDR request is received.
    - **Death** – Actively pending = An Death discharge request has been approved at the time the SDR request is received.
        - If any of those discharges/forgiveness are actively pending the servicer shall return the SDR request as unprocessed.

o 43010.010 Servicers shall allow borrowers to request to have SDR forgiveness reversed from a loan, within 6 months of the SDR application, if the borrower becomes eligible for the loan to be discharged for any other type of discharge or forgiveness.

- 43010.011: The six-month limit will be upheld unless there is a court order requiring the other discharge type be applied (for example to comply with a settlement agreement).
- 43010.012: Anytime, within the six-month period, that the borrower is eligible for a full discharge or forgiveness under the hierarchy above, the servicer shall reverse the SDR discharge and apply the other full discharge or forgiveness.

o 43010.020 If a servicer applies a partial discharge, after a Measure 1 discharge is applied, it shall never result in a credit balance. For example, if a borrower has a $5000 balance and receives $3000 in SDR forgiveness, leaving a $2000 balance. If the borrower then becomes eligible for and receives a $2,500 discharge, the servicer shall adjust the balance to $0 and the borrower would not receive a refund.

Artifacts:

1. Detailed Requirements
2. Requirements Stage Gate
3. Detailed Design Document
4. Solution User Manual
5. Release Version Description Document
6. Data Management Documentation
7. Data Documentation
8. Technical Design Stage Gate
9. Master Test Plan
10. Phase Level Test Plan
11. Test Suites (Cases)
12. User Acceptance Test (UAT) Summary Report
    a. Full UAT documentation (Test Plan, Test Cases, Results)
13. Test Summary Report (System Test)
14. Defect Management Report
15. Test Readiness Review (TRR) Stage Gate
16. Implementation Plan
17. Training Plan
18. Operations and Maintenance Plan
19. Production Readiness Review (PRR) Stage Gate
- Sample Operational Report
- Borrower Notification
- Compliance Statement Post implementation

Appendix A – Attachment Crosswalk

USDS Requirement Series	USDS Requirement #	USDS Attachment Name
18000 Servicing Transfers	18000.001	18000 EA27V5 Layout
	18000.001, 18001.011, 18002.011	18000 EA80V4 Collateral File
	18000.001, 21006.130	18000 Cancer Deferment Supplemental File
	18000.001	18000 PAYE Supplemental File
	18000.001	18000 SAVE Supplemental File
	18000.001	18000 PSLF Borrower File
	18000.001	18000 ICR supplemental file
	18000.001	18000 Cancer Deferment
	18000.001	18000 IBR anniversary for COVID
	18000.001	18000 SCRA Statutory rates

FC042524

	18000.001	18000 Hostile Duty
	18000.001	18000 IDR Counters
	18000.001	18000 Bankruptcy Data Report With Attorney
	18000.001	18000 Standing Payment Instructions
	18000.001	18000 Sending Servicer Account Number
	18000.001	18000 Borrower Defense Data
	18000.001	[CHANGE] 18000 Discharge Data Report v2
	18000.001	18000 Plus Deferment Indicators
	18000.001	18000 SULA Eligible loans
	18000.001	18000 Def/Forb greater than 99 months
	18000.001	18000 Defer/Forb Starting at end of Covid Forb
	18000.001	18000 Address Limitation
	18000.001	18000 Cease and Desist
	18000.001	18000 Work in Progress
	18000.001	18000 TCPA Consent
	18000.001	18000 Pending Rebate Loss
	18000.001	18000 Post Deferment Grace
	18000.001	18000 Special Direct Consol Terms
	18000.001	18000 PIF Loan Details
	18000.001	18000 Borrower Special Handling
	18000.001	18000 Truncated Financials
	18000.001	18000 In School Deferment Opt Outs
	18000.001	18000 L1 Credit
	18000.001	18000 Historical Credit
	18009.020	18000 EA27 TrackingLog.xlsx
	18000.001	18000 CRA-Batch_Interface_Specification
	18000.001	18000 Last Inactive Schedule Transfers
	18000.001	18000_RPS History
	18000.001	Supplemental File Tax Form 1098E
	18000.001	18000 PIF Loan Transfer Payment Recd